REMARKS

Claims 1-60 were presented for examination, and claims 1-60 stand rejected. Thus, claims 1-60 are presently pending in this application, of which claims 1, 13, 19, 25, 30, 35, 37, 49 and 55 are independent. Applicants submit that pending claims 1-60 are in condition for allowance.

The following comments address all stated grounds of rejection. The Applicants urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

Claim Rejections Under 35 U.S.C. §102

I. Claims 1-60 Stand Rejected Under 35 U.S.C §102 As Being Anticipated By Fong

Claims 1-60 stand rejected under 35 U.S.C. §102 as being anticipated by Fong et al. (U.S. Patent No. 6,085,196) ("Fong 96"), which incorporates by reference U.S. Patent No. 6,009,436 ("Fong 36") and U.S. Patent No. 6,678,867 ("Fong 67") (collectively referred to as "Fong"). Applicants respectfully traverse this rejection.

A. Independent Claims 1, 25, and 37 Patentably Distinguished Over Fong

Independent claims 1, 25, and 37 are directed to a method, system, and apparatus, respectively, for storing a data object to an object database that stores data objects in a programming language different from the programming language of the data object. These independent claims recite receiving a request to store in a database capable of storing data objects in a second programming language a first data object implemented in a first programming language and in response to the request, storing a second data object implemented in a second programming language to the database. The first data object in the first programming language is transformed to the second data object in the second programming language to include the attributes and attribute values of the class of the first

data object. That is, the claimed invention is directed towards storing a data object to an object database that stores data objects in a programming language different from the programming language of the data object requested to be stored. Applicants contend that Fong fails to disclose each and every feature of the claimed invention.

Fong does not disclose a database capable of storing data objects, or an object database. An object database stores objects instead of tuples or records in a relational database. In the Office Action, the Examiner argues that Fong describes an object-oriented framework using a computer system and that an object-oriented framework anticipates the claimed invention since databases are used in computer processing (see page 10, second paragraph, Office Action). Applicants respectfully disagree with the Examiner and contend that simply because Fong uses an object-oriented framework for processing the conversion of an SGML document to an HTML document does not equate to storing a data object to an object database as in the claimed invention. The database of Fong (254, Figure 6B, Fong 96) is not described as an object database, but instead is simply referred to as a database. Furthermore, Fong does not describe data objects being stored to the database (254, Figure 6B). Rather, the map (212, Figure 6B) from the map editor and the HTML document output (216, Figure 5) from the transformer (186, Figure 6B) are stored in the database (see column 12, lines 41-67, Fong 96). As such, Fong fails to disclose a database capable of storing data objects.

Additionally, Fong does not disclose receiving a request to store in a database capable of storing data objects in a second programming language a first data object implemented in a first programming language. That is, the claimed invention receives a request to store a data object implemented in a first programming language in the object database that stores objects in a second programming language. In the Office Action, the Examiner indicates Fong initiates a translation request and the transformed data object will be returned to the user via

the user interface as a natural course of user involvement. Applicants contend that the user interface initiation of a translation request in Fong does not equate to the request of the claimed invention to store a data object implemented in a first programming language in an object database that stores objects in a second programming language. Rather, the user interface of Fong initiates the translation of one document into another document. Although Fong may use objects for performing the translation, the document requested to be converted is not an object but instead is a text-based file including text based characters in a markup language, such as HTML or SGML. As such, Fong requests the translation of a text-based document instead of requesting to store a data object into an object database. Furthermore, Fong does not disclose storing a second data object implemented in a second programming language to the database in response to receiving the request. Rather, in response to receiving a request to convert a text-based document, Fong converts the text-based document into another type of text-based document format. Thus, Fong fails to disclose receiving a request to store in a database capable of storing data objects in a second programming language a first data object implemented in a first programming language, and in response to the request, storing to the database a second data object implemented in a second programming language.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that claims 1, 25, and 37 are patentable and in condition for allowance. Claims 2-12 depend on and incorporate the patentable subject matter of independent claim 1. Claim 26-29 depend on and incorporate the patentable subject matter of independent claim 25. Claim 38-48 depend on and incorporate the patentable subject matter of independent claim 37. As such, claims 2-12, 26-29, and 38-48 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 1-12, 25-29 and 37-48 under 35 U.S.C. §102.

B. Independent Claims 13, 30 and 49 Patentably Distinguished over Fong

Amended independent claims 13, 30, and 49 are directed are towards a method, system and apparatus, respectively. These independent claims recite receiving a request from an application that processes data objects in a first programming language a data object in a database storing the data object in a second programming language. The data object is accessed and the accessed data object is transformed into a transformed data object implemented in a second programming language. The transformed data object includes an attributes and attribute value of the class in the accessed data object. In response to the request, the transformed data object is returned to the application.

Fong does not disclose receiving from an application that processes data objects in a first programming language a request for a data object in a database storing the data object in a second programming language. Rather, Fong receives a requests to convert a text-based document in one mark-up language into another mark-up language. Although the application of Fong processes objects in a programming language to perform the document conversion, Fong does not disclose an object database, and therefore, Fong does not disclose a request for a data object from an object database storing the data object. Fong is concerned with processing the conversion of text-based documents instead of being concerned with processing data objects stored in an object database that stores data objects in a programming language different than the application. Therefore, Fong fails to disclose receiving from an application that processes data objects in a first programming language a request for a data object in a database storing the data object in a second programming language.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that claims 13, 30, and 49 are patentable and in condition for allowance. Claims 14-18 depend on and incorporate the

patentable subject matter of independent claim 13. Claims 31-34 depend on and incorporate the patentable subject matter of independent claim 30. Claims 50-54 depend on and incorporate the patentable subject matter of independent claim 49. As such, claims 14-18, 31-34, and 50-54 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 13-18, 30-34, and 50-54 under 35 U.S.C. §102.

C. Independent Claims 19, 35 and 55 Patentably Distinguished over Fong

Independent claims 19, 35, and 55 are directed are towards a method, system and apparatus, respectively. These independent claims recite receiving a definition of a class and attributes in the class of a first data object implemented in a first programming language, generating a file, and adding information to the file to provide a class schema representing the class and each attribute in the class. That is, the claimed invention generates a file to provide a class schema representing the class and each attribute of the class of a first data object implemented in a first programming language.

Fong does not disclose generating a file to provide a class schema representing the class and each attribute of the class of a first data object implemented in a programming language. Although Fong generally describes an object-oriented framework for document conversion, Fong does not describe generating a file having a class representing the class of a first data object implemented in a programming language. Rather, Fong is concerned with using objects to process a non-object of a text-based document, such as an SGML file. In the Office Action, the Examiner identifies in Fong (column 8, lines 14-64) a discussion of the process to convert an SGML document into an HTML document as anticipating the claimed invention. The cited section of Fong describes the mapping of the elements of the SGML document to the corresponding mark-up language of an HTML formatted document. Instead

of describing generating a class scheme for a first data object implemented in a first programming language, this cited section of Fong describes parsing a mark-up language of a text-based document, which is not a data object implemented in a programming language. As such, Fong does not disclose generating a file to provide a class schema representing the class and each attribute of the class of a first data object implemented in a programming language.

Additionally, in the Office Action, the Examiner indicates that Fong teaches the mapping of structured information to different structured information in an object-oriented framework, and therefore anticipates the claimed invention (see page 11 of Office Action). Applicants kindly remind the Examiner that a claim is anticipated only if each and every element as set forth in the claim is found in a single prior art reference. Applicants contend that Fong does not disclose, teach, or suggest each and every element of the claimed invention. Furthermore, the Examiner indicates that independent claims 19, 35, and 55 bear on a plurality of prior art (see page 11 of Office Action). In order to expedite prosecution, if the Examiner is aware of prior art material to the patentability of the claimed invention, Applicants respectfully request the Examiner to cite such art for consideration during prosecution of this application.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that claims 19, 35 and 55 are patentable and in condition for allowance. Claims 20-24 depend on and incorporate the patentable subject matter of independent claim 19. Claim 36 depends on and incorporates the patentable subject matter of independent claim 35. Claims 56-60 depend on and incorporate the patentable subject matter of independent claim 55. As such, claims 20-24, 36, and 56-60 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 19-24, 35-36, and 55-60 under 35 U.S.C. §102.

CONCLUSION

In light of the aforementioned arguments, Applicants contend that each of the Examiners rejections has been adequately addressed and the pending application is in condition for allowance.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at (617) 227-7400.

Respectfully submitted,
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